

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

LENNISHA REED AND LENN REED JR., )  
as co-Administrators of the Estate of )  
LENN REED SR. )

Plaintiffs )

v. )

No.: 20-cv-01139-SPM

WEXFORD HEALTH SOURCES, INC, )  
*et al.*, )

Defendants. )

**MOTION FOR HIPAA QUALIFIED PROTECTIVE ORDER**

NOW COMES Defendant, FAIYAZ AHMED, M.D., by and through his attorney, Keith B. Hill of HEYL, ROYSTER, VOELKER & ALLEN, P.C., and moves the Court for the entry of a HIPAA Qualified Protective Order. In support thereof, Defendant states as follows:

1. Plaintiffs have filed this cause of action in which the medical condition and treatment of decedent, LENN REED SR., is in issue.

2. Pursuant to 45 C.F.R. 164.512 of the Health Insurance Portability and Accountability Act (HIPAA) a Qualified Protective Order is necessary to allow the parties to this litigation to obtain and use protected health information pursuant to HIPAA for the purpose of this litigation while preventing unauthorized disclosure of said protected health information.

3. That a Qualified Protective Order should be entered to protect the protected health information from authorized disclosure while still permitting its use solely for purposes of this litigation.

WHEREFORE, Defendant, FAIYAZ AHMED, M.D., respectfully moves the Court to enter a Qualified Protective Order and for such other relief as the Court deems necessary.

FAIYAZ AHMED, M.D., Defendant,

/s/ Keith B. Hill

BY: \_\_\_\_\_  
HEYL, ROYSTER, VOELKER & ALLEN, P.C.  
Keith B. Hill  
ARDC #6277660

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on **May 24, 2021**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Keith B. Hill

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Keith B. Hill